

CLARK COUNTY SCHOOL DISTRICT
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

O.T., a Minor, by her Father and Legal
Guardian, OTIS LEE TANNER; OTIS LEE
TANNER, an Individual,

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT;
STEVEN JACKSON, an Individual;
KIMBERLY PERRY-CARTER, Valley
High School Principal; CLARK COUNTY
SCHOOL DISTRICT POLICE
DEPARTMENT, DOES I through XX; and
ROE BUSINESS ENTITIES I through XX,
inclusive,

Defendants.

Case No.: 2:24-cv-01841-JAD-NJK

**STIPULATION AND ORDER TO
STAY CASE [THIRD REQUEST]**

ECF No. 27

Defendants CLARK COUNTY SCHOOL DISTRICT, STEVEN JACKSON,
KIMBERLY PERRY-CARTER, AND CLARK COUNTY SCHOOL DISTRICT POLICE
DEPARTMENT (collectively "CCSD Defendants"), and Plaintiffs O.T., a minor by her father

1 and legal guardian OTIS LEE TANNER and OTIS LEE TANNER, an individual (collectively
2 “Plaintiffs”) by and through their respective counsel of record, hereby submit this third request to
3 stay the instant case:

- 4 1. On August 16, 2024, Plaintiffs O.T., a minor by her father and legal guardian OTIS LEE
5 TANNER and OTIS LEE TANNER, an individual (collectively “Plaintiffs”) filed a civil
6 action in the Eighth Judicial District Court (A-24-899923-C) against Defendants CLARK
7 COUNTY SCHOOL DISTRICT, STEVEN JACKSON, KIMBERLY PERRY-CARTER,
8 AND CLARK COUNTY SCHOOL DISTRICT POLICE DEPARTMENT (collectively
9 “CCSD Defendants”). ECF No. 1.
- 10 2. On October 2, 2024, CCSD Defendants filed a Notice of Removal of Civil Action. ECF
11 No. 1.
- 12 3. On October 3, 2024, this Court entered an Order that required Plaintiffs to obtain counsel
13 by November 4, 2024. ECF. No. 4.
- 14 4. On October 9, 2024, CCSD Defendants filed a Motion to Extend Deadline to Respond to
15 Complaint. ECF No. 5.
- 16 5. On October 10, 2024, the Motion to Extend was denied and CCSD Defendants were
17 ordered to file an answer or other responsive pleading by October 17, 2024. ECF No. 6.
- 18 6. On October 17, 2024, CCSD Defendants filed a Motion to Dismiss. ECF No. 8.
- 19 7. On November 4, 2024, Plaintiffs filed a Motion to Extend Time to Secure Counsel. ECF
20 No. 11.
- 21 8. On November 5, 2024, the Motion to Extend was granted, Plaintiffs’ counsel was ordered
22 to file a notice of appearance by November 18, 2024. ECF No. 12.
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- 1 9. On November 21, 2024, this Court ordered Plaintiffs' counsel to file a notice of
2 appearance by November 26, 2024. The Order provided that failure to comply with the
3 order may result in dismissal of the representative claims. ECF No. 13.
- 4 10. On November 27, 2024, Attorney Carl E.G. Arnold, Esq., filed a Notice of Appearance on
5 behalf of Plaintiff Otis Tanner, an individual. ECF No. 14.
- 6 11. On December 3, 2024, this Court ordered the Parties to file a Joint Discovery Plan by
7 December 10, 2024. ECF No. 15.
- 8 12. On December 16, 2024, the Parties filed an Amended Stipulated Discovery Plan and
9 Scheduling Order. ECF No. 18.
- 10 13. On December 17, 2024, this Court entered an Order giving Plaintiffs' counsel until
11 December 31, 2024 to file a response to CCSD Defendants' Motion to Dismiss. ECF No.
12 19.
- 13 14. On December 17, 2024, this Court entered an Order granting the Amended Stipulated
14 Discovery Plan and Scheduling Order. ECF No. 20.
- 15 15. On December 31, 2024, the parties filed a joint stipulation requesting a 60 day stay of this
16 case, including all dates and deadlines now pending – which includes Plaintiffs' deadline
17 to submit a response to CCSD Defendants' Motion to Dismiss. ECF No. 22.
- 18 16. On January 2, 2025, this Court entered an Order granting a stay through March 2, 2025.
19 ECF No. 23. A status report was due on or before March 3, 2025. ECF No. 23.
- 20 17. On March 5, 2025, a Stipulation and Order to Stay Case [Second Request] was filed and
21 this Court entered an Order granting a stay through May 5, 2025. A status report was due
22 on or before May 5, 2025. ECF Nos. 24 and 25.
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1 18. On May 8, 2025, an Order was entered directing the Parties to file a Status Report on or
2 before May 12, 2025. ECF No. 26.

3 19. Upon information and belief, during a May 12, 2025, appearance in State of Nevada v.
4 Otis Tanner, Case No. C-23-375895-1, Defendant Tanner requested a continuance of his
5 criminal trial currently scheduled to begin June 9, 2025. **Exhibit 1.**

6 20. The criminal charges against Tanner in Case No. C-23-375895-1 stem from the same
7 August 17, 2022 events that are at issue in this civil proceeding.

8 21. With the criminal charges still pending, the parties have discussed but have been unable to
9 resolve issues related to the filing of an amended complaint, the scope of discovery and/or
10 settlement.

11 22. Therefore, the parties are jointly submitting a third request that this matter be stayed
12 pending the outcome of State of Nevada v. Otis Tanner, Case No. C-23-375895-1.

13 23. This request is made in good faith and is not sought any improper purpose or for the
14 purpose of delay.

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17 IT IS SO STIPULATED.

18 DATED this 12th day of May, 2025.

DATED this 12th day of May, 2025.

19 CLARK COUNTY SCHOOL DISTRCT
20 OFFICE OF THE GENERAL COUNSEL

CEGA LAW GROUP

21
22 By: /s/ Sami Randolph
23 Sami Randolph, Esq.
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27 *Attorney for Defendants*
28 *Clark County School District,*
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By: /s/ Carl E.G. Arnold
Carl E.G. Arnold, Esq.
Nevada Bar No. 8358
770 Coronado Center Drive, Suite 100
Henderson, NV 89052
Attorney for Plaintiffs

ORDER

IT IS SO ORDERED that in accordance with the above stipulation:

1. This case is hereby STAYED for an additional 60 days until July 11, 2025.
2. The Parties must file a Joint Status Report with the Court advising of the status of
State of Nevada v. Otis Tanner, Case No. C-23-375895-1 on or before July 11, 2025.


UNITED STATES DISTRICT JUDGE

DATED: 5/23/25

Submitted by:

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

By: /s/ Sami Randolph
Sami Randolph, Esq.
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